

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

	X	
In re:	:	Chapter 7
	:	
GMS Sunset LLC	:	No. 25-11181-BFK
	:	
Debtor.	:	
	:	
	X	

RESPONSE OF DEBTOR AND EQUITY HOLDERS TO MOTION TO SELL

NOW COMES the Debtor, its tenant Amphora Bakery Inc., and its equity security holders and responds as follows to the Trustee's Motion to Sell the Debtor's office condominium.

The condominium is in fact two adjoining units, which the Trustee proposes to sell together for \$1.6 million. The total debt in this case is about \$400,000. The Debtor here is a single asset real estate entity formed to hold the real estate used by the tenant/operating company owned by the same people, Amphora Bakery Inc. Amphora Bakery is not in bankruptcy and is a viable business.

First, it must be noted that the owners found a potential buyer for both units, Mark Bredeesen, who reached out to the Trustee's agent, Stephanie Young, on December 19, prior to the execution of the contract at issue, and inquired about making a \$1.4 million offer. Mr. Bredeesen will testify that the agent rejected his proposal, stating that they already had a

Daniel M. Press, VSB# 37123
Chung & Press, P.C.
6718 Whittier Ave., Suite 200
McLean, VA 22101
(703) 734-3800
Counsel for Debtor and Owners

higher offer, which is patently untrue.¹ This raises serious questions about whether the agent (and ultimately the Trustee) sought and obtained the best price.

That said, this is a solvent Debtor, so the views of the Debtor/equity holders should be considered. A sale of one single unit (Unit 294, the front unit) for \$500,000 will satisfy all claims, including a commission for the real estate agent and the trustee, and reasonable trustee's attorney's fees. Mr. Bredesen is prepared to buy Unit 294 for \$500,000 (and to increase the offer if necessary to ensure that all creditors and administrative claimants are paid in full) and lease it back to the Debtor's tenant so that the business can continue to operate. He has the cash and financing arranged and can close within 30 days.

While this results in less cash to the owners, they prefer to keep their business running. The Court should deny the motion as filed and instead allow the sale to Mr. Bredesen,

.

Dated: February 19, 2026.

Respectfully submitted,

/s/ Daniel M. Press

Daniel M. Press, VSB 37123

Chung & Press, P.C.

6718 Whittier Ave., Suite 200

McLean, VA 22101

(703) 734-3800

(703) 734-0590 fax

dpress@chung-press.com

¹ The \$1.4 million may no longer be available because the funds came from a 1031 exchange and had to be reinvested, so Mr. Bredesen reinvested them elsewhere.

CERTIFICATE OF SERVICE

This is to certify that on this 19th day of February, 2026, I caused the foregoing document to be served by CM/ECF on the Trustee, the US Trustee and all persons requesting notice by CM/ECF.

/s/ Daniel M. Press
Daniel M. Press